BARRY R. FEERST & ASSOCIATES (BRF3836)
Attorneys for Defendants
194 South 8th Street
Brooklyn, NY 11211
t(718) 384-9111
f(718) 384-5999

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
----------------------------------X
In re:

Chapter 7

Case No.: 1-15-44128(CEC)

HAROLD TISCHLER,

Debtor.
----------------------------------X
CHICAGO TITLE INSURANCE COMPANY

Plaintiff,

Adversary No.: 15-1194 (CEC)

- against -

HAROLD TISCHLER,

Defendant.
----------------------------------X

DECLARATION IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS

YITZCHOK KOTKES declares the following pursuant to 28 U.S.C. §1746:

1. I am an attorney for Harold Tischler ("Tischler") in the above-entitled Adversary Proceeding.

2. CTI's Adversary Complaint was filed on December 9, 2015. (Attached as Exhibit "1.")

3. Tischler filed his Answer to CTI'S complaint on April 21, 2016. (Attached as Exhibit "2.")

4. As the accompanying memorandum of law makes clear, CTI'S action must be dismissed on the ground that the pleadings establish that the Statute of Limitations has run on all of CTI'S claims.

WHEREFORE, it is requested that this motion be granted in its entirety.

YITZCHOK KOTKES (YK0338)

Dated: Brooklyn, New York
June 16, 2016

To: Brian S. Tretter, Esq. - Via ECF
Fidelity National Law Group
Attorney for Plaintiff
105 Eisenhower Parkway, Suite 103
Roseland, NJ 07068
(973) 863-7019